

EXHIBIT B

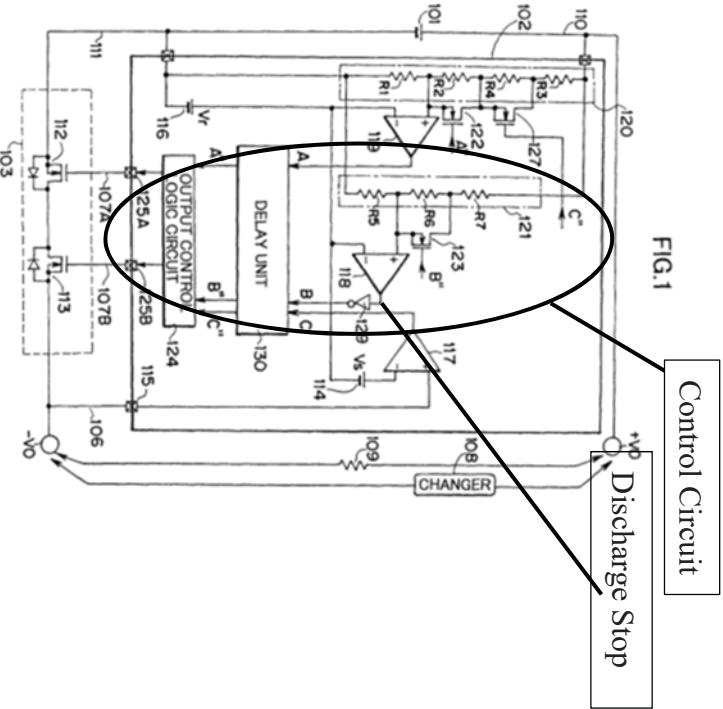
Exhibit B: Claim Chart for U.S. Pat. No. 6,346,795**Based on:**

U.S. Pat. No. 5,959,437 to Hamaguchi (“the ‘437 patent”)
 (Filed Feb. 9, 1998; Priority Date Feb. 10, 1997; Issued Sept. 28, 1999)

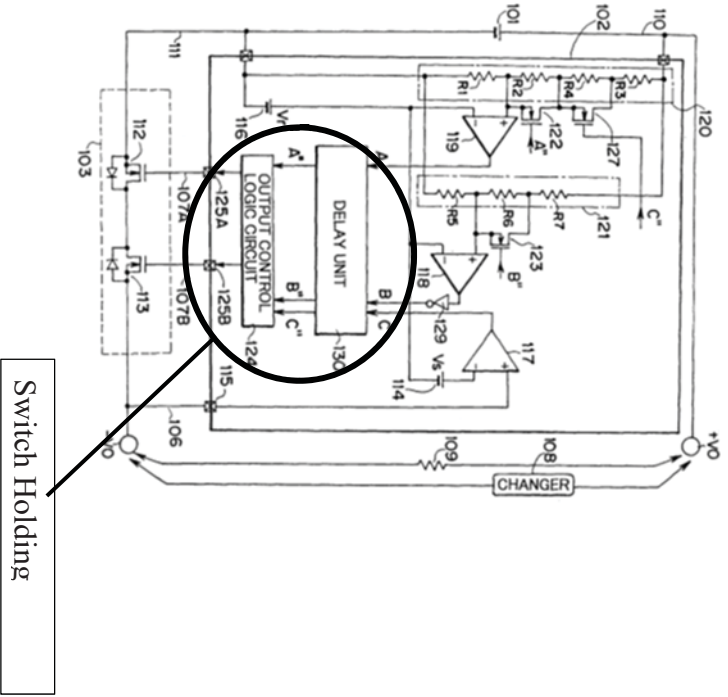
Claim Element	Claim Language — U.S. Patent No. 6,346,795	Exemplary Disclosures from the ‘437 patent
1[pre]	A discharge control circuit for controlling discharge of a battery including at least one cell comprising:	<p>To the extent the preamble is limiting, the ‘437 patent discloses “a discharge control circuit for controlling discharge of a battery including at least one cell,” at least under Celebration IP’s interpretation of that term in its Complaint.</p> <p><i>See, e.g.:</i></p> <p>“To obtain a required delay time at each control using one capacitor in common, a charge and discharge control circuit includes an overcharge detecting circuit, <u>an overdischarging circuit</u>, and an overcurrent detecting circuit and carries out charge and discharge control of <u>a secondary cell</u> by ON/OFF control.” (‘437, abstract) (emphasis added).</p> <p>“... the charge and discharge control circuit of the present invention controls a charge and discharge of a Secondary cell connected to an external power source terminal through a Switch circuit by ON/OFF controlling said switch circuit and further includes ... an <u>overdischarge detecting circuit</u> ...” (‘437, Col. 1, lines 45-50) (emphasis added).</p>
1[a]	a discharge control switch connected to the battery for cutting off a discharge current of the battery in response to a discharge stop signal; and	<p>The ‘437 patent discloses “a discharge control switch connected to the battery for cutting off a discharge current of the battery in response to a discharge stop signal,” at least under Celebration IP’s interpretation of that term in its Complaint.</p> <p><i>See, e.g.:</i></p>

Claim Element	Claim Language — U.S. Patent No. 6,346,795	Exemplary Disclosures from the '437 patent
		<div data-bbox="626 835 1349 1518"> </div> <p>FIG. 1</p> <p>Battery</p> <p>Discharge Control Switch</p> <p>CHARGER</p> <p>+V0</p> <p>-V0</p> <p>101</p> <p>102</p> <p>103</p> <p>104</p> <p>105</p> <p>106</p> <p>107</p> <p>108</p> <p>109</p> <p>110</p> <p>111</p> <p>112</p> <p>113</p> <p>114</p> <p>115</p> <p>116</p> <p>117</p> <p>118</p> <p>119</p> <p>120</p> <p>121</p> <p>122</p> <p>123</p> <p>124</p> <p>125</p> <p>126</p> <p>127</p> <p>128</p> <p>129</p> <p>130</p> <p>131</p> <p>132</p> <p>133</p> <p>134</p> <p>135</p> <p>136</p> <p>137</p> <p>138</p> <p>139</p> <p>140</p> <p>141</p> <p>142</p> <p>143</p> <p>144</p> <p>145</p> <p>146</p> <p>147</p> <p>148</p> <p>149</p> <p>150</p> <p>151</p> <p>152</p> <p>153</p> <p>154</p> <p>155</p> <p>156</p> <p>157</p> <p>158</p> <p>159</p> <p>160</p> <p>161</p> <p>162</p> <p>163</p> <p>164</p> <p>165</p> <p>166</p> <p>167</p> <p>168</p> <p>169</p> <p>170</p> <p>171</p> <p>172</p> <p>173</p> <p>174</p> <p>175</p> <p>176</p> <p>177</p> <p>178</p> 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<p>998</p> <p>999</p> <p>1000</p>

Claim Element	Claim Language — U.S. Patent No. 6,346,795	Exemplary Disclosures from the '437 patent
		<p>To the extent that the '437 patent does not expressly disclose this claim element, the '437 patent, alone or in combination with other prior art, renders the claimed subject matter obvious. For example, as shown in Exhibit A, U.S. Patent No. 5,397,974 to Tamai, <i>et al.</i> ("the '974 patent") discloses this claim element, at least as Celebration IP has interpreted it in its Complaint. A person of ordinary skill in the art would have been motivated to combine the '437 patent and the '974 patent at least because the patents both relate to battery discharge control and purport to solve similar problems.</p>
1[b]	<p>a control circuit connected to the battery and the discharge control switch for generating the discharge stop signal that deactivates the discharge control switch when a voltage of at least one cell reaches a lower limit,</p>	<p>The '437 patent discloses "a control circuit connected to the battery and the discharge control switch for generating the discharge stop signal that deactivates the discharge control switch when a voltage of at least one cell reaches a lower limit," at least under Celebration IP's interpretation of that term in its Complaint.</p> <p><i>See, e.g.,</i></p>

Claim Element	Claim Language — U.S. Patent No. 6,346,795	Exemplary Disclosures from the '437 patent
		<p data-bbox="532 800 565 1209">('437, FIG. 1) (emphasis added)</p> <p data-bbox="243 800 495 1885">“Voltage of the secondary cell 101 is detected by a charge and discharge control circuit 102 as described below, and the FETs 112 and 113 are ON/OFF controlled depending on the result detected. The charge and discharge control circuit 102 includes . . . an over discharge detecting reference voltage circuit 116 for supplying predetermined reference voltage V_r to . . . the overdischarge detecting comparator 118, . . . another voltage divider circuit 121 comprising resistors R5 to R7 for dividing the terminal voltage of the secondary cell 101, a delay</p> 

Claim Element	Claim Language — U.S. Patent No. 6,346,795	Exemplary Disclosures from the '437 patent
		<p>unit 130, and an output control logic circuit 124.” ('437, Col. 2, lines 44-58) (emphasis added)</p> <p>“The overdischarge detecting comparator 118 has a construction detecting an overdischarge state comparing reference voltage V_r of the reference voltage circuit 116 with the divided output reflecting the terminal voltage of the secondary cell 101 occurring at both terminals of the resistor R5 of the voltage divider circuit 121.” ('437, Col. 3, lines 22-27).</p> <p>“An inverter circuit 129 is formed at output side of the overcharge detecting comparator 118, and <u>output B changing low level to high level is output from the inverter circuit 129 when output of overdischarge detecting comparator 118 changes high level to low level, namely when the overdischarge state is detected.</u> Output B is input to the delay unit 130, and when output B turns high level from low level for example, output B” of the delay unit 130 can change low level to high level with the predetermined delay time.” ('437, Col. 3, lines 33-41) (emphasis added).</p> <p>To the extent that the '437 patent does not expressly disclose this claim element, the '437 patent, alone or in combination with other prior art, renders the claimed subject matter obvious. For example, as shown in Exhibit A, the '974 patent discloses this claim element, at least as Celebration IP has interpreted it in its Complaint. A person of ordinary skill in the art would have been motivated to combine the '437 patent and the '974 patent at least because the patents both relate to battery discharge control and purport to solve similar problems.</p>
1[c]	wherein the control circuit includes a switch holding circuit for continuously supplying the discharge stop signal to the discharge	<p>The '437 patent discloses a control circuit that “includes a switch holding circuit for continuously supplying the discharge stop signal to the discharge control switch for a predetermined time after the discharge stop signal is generated,” at least under Celebration IP’s interpretation of that term in its Complaint.</p> <p><i>See, e.g.,</i></p>

Claim Element	Claim Language — U.S. Patent No. 6,346,795	Exemplary Disclosures from the '437 patent
	control switch for a predetermined time after the discharge stop signal is generated.	<p style="text-align: center;">FIG. 1</p>  <p>(‘437, FIG. 1) (emphasis added)</p> <p>“An inverter circuit 129 is formed at output side of the overcharge detecting comparator 118, and output B changing low level to high level is output from the inverter circuit 129 when output of overdischarge detecting comparator 118 changes high level to low level, namely when the overdischarge state is detected. <u>Output B is input to the delay unit 130, and when output B turns high level from low level for example, output B” of the delay unit 130 can change low level to high level with the predetermined delay time.</u>” (‘437, Col. 3, lines 33-41) (emphasis added).</p>